

## FLUORIDE AMBIENT AIR STANDARDS

### Questions and Answers

1. Q: What does this bill do?

A: This bill precludes the adoption by the Board of Health of an additional ambient air fluoride standard.

2. Q: Why do we need this bill?

A: The state needs this bill to prevent adoption of an unnecessary and unenforceable regulation by the Board of Health under the Clean Air Act of Montana. Industry needs this bill so that it will not be forced to attempt to comply with an unnecessary standard that cannot be met.

3. Q: Why not adopt the federal ambient air fluoride standard?

A: There is no federal ambient air standard for fluoride.

4. Q: Why is there no federal standard?

A: The EPA is required to issue ambient air standards for pollutants designated as "criteria" pollutants. The criteria pollutants are those generally considered to cause endangerment to public health or welfare. The EPA has concluded that fluoride emissions have no significant effect on human health, and thus, "do not contribute to the endangerment of public health." Therefore, an ambient air standard for fluoride (which by statute would have to be set at a level necessary to protect public health), has not been adopted.

5. Q: What are forage grasses, hay and silage?

A: These are vegetative species susceptible to fluoride accumulation, and are the primary nutrients for domestic livestock.

6. Q: What is the difference in this bill from the Montana Ambient Air Quality Standard proposal?

A: This bill would limit the control of the effects of fluorides by means of the two fluoride standards currently in effect, rather than by allowing an additional, and redundant, third standard to be imposed.

7. Q: Why shouldn't a fluoride ambient standard be enacted?

A: An ambient fluoride standard is unnecessary. Ambient standards are useful only if the pollutant can cause endangerment to public health. This criteria is not applicable to fluoride. Secondly, there are currently two fluoride standards in effect. These are an emission standard and a fluoride in forage standard. The purported purpose of the ambient fluoride standard - to limit the amount of fluoride available for uptake in vegetation - is more readily and effectively achieved by the other two standards, making an ambient standard redundant. Third, the proposed ambient standard (1.0 part per billion for 24 hours and 0.3 ppb for 30 days) is so low that it cannot be accurately monitored, even with the most advanced equipment on the market today. Therefore, the standard would be unenforceable and unattainable.

8. Q: Who will set the standards for fluoride in forage?

A: The Montana Board of Health and Environmental Sciences.

9. Q: Who has the responsibility for enforcing the standards?

A: The Montana Department of Health and Environmental Sciences.

10. Q: Who will be affected?

A: Fluoride emitting sources (Anaconda Aluminum and Stauffer Chemical at this time).

11. Q: Why does Montana need an ambient fluoride standard if the federal government does not?

A: Montana also does not need it.

12. Q: Would a higher, and thus more measurable, ambient fluoride standard be of any benefit?

A: No. That the proposed standard is unmeasurable is only one of the reasons it should not be adopted. The main reason is that any standard is simply not necessary.

13. Q: On July 18, 1980, the Board of Health adopted a fluoride in forage standard of 20 micrograms per gram. Anaconda Aluminum and others have subsequently filed suit against the Board over this standard because it is impossible to meet. How do you know it is impossible to meet?

A: Forage sampled during the fall of 1980 averaged well above 20 micrograms per gram.

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